

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs,

- against -

MUFG UNION BANK, N.A. and GLAS AMERICAS
LLC,

Defendants.

Case No: 19-cv-10023-KPF

**DECLARATION OF JAMES R. BLISS ATTACHING
SOURCES CITED BY PLAINTIFFS' VENEZUELAN LAW EXPERT**

I, JAMES R. BLISS, hereby declare pursuant to 28 U.S.C. § 1746 and Local Rule 7.1 as follows:

1. I am a partner at Paul Hastings LLP, attorneys for plaintiffs and counterclaim defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A.
2. This declaration attaches certain sources cited by Professor Brewer-Carías that have not previously been filed with the Court.
3. Attached as **Exhibit 1** is a true and correct excerpt (with highlights) of a republication of Rafael Badell Madrid, *Contratos de Interés Público Nacional*, in 19 REVISTA DE DERECHO ADMINISTRATIVO (Editorial Sherwood ed., 2005) (translated).
4. Attached as **Exhibit 2** is a true and correct excerpt (with highlights) of Rafael Badell Madrid, *Speech at the III Academic Conference on Public Contracting, Contratos de interés público* (June 29, 2018) (translated).
5. Attached as **Exhibit 3** is a true and correct copy of a letter from Allan R. Brewer-Carías to Godofredo Gonzalez, President of the Venezuelan Senate (Aug. 11, 1982) (translated).

6. Attached as **Exhibit 4** is a true and correct excerpt (with highlights) of Allan R. Brewer-Carías, *Los contratos de interés nacional y su aprobación legislativa*, in REVISTA DE DERECHO PÚBLICO 52 (Editorial Jurídica Venezolana ed., 1982) (translated).

7. Attached as **Exhibit 5** is a true and correct excerpt (with highlights) of Allan R. Brewer-Carías, *Nuevas consideraciones sobre el régimen de los contratos del Estado en Venezuela*, in 2 VIII JORNADAS INTERNACIONALES DE DERECHO ADMINISTRATIVO 449–50 (Fundación Estudios de Derecho Administrativo ed., 2006) (translated).

8. Attached as **Exhibit 6** is a true and correct excerpt (with highlights) of Allan R. Brewer-Carías, *Nuevas consideraciones sobre el régimen de los contratos del Estado en Venezuela*, in 2 VIII JORNADAS INTERNACIONALES DE DERECHO ADMINISTRATIVO 451 (Fundación Estudios de Derecho Administrativo ed., 2006) (translated).

9. Attached as **Exhibit 7** is a true and correct excerpt (with highlights) of Jesús Caballero Ortiz, *Las Empresas Públicas en el Derecho Venezolano*, (Editorial Jurídica Venezolana ed., 1982) (translated).

10. Attached as **Exhibit 8** is a true and correct excerpt (with highlights) of Luis H. Farías Mata, *La Teoría del Contrato Administrativo en la Doctrina, Legislación y Jurisprudencia Venezolanas*, in 2 LIBRO HOMENAJE AL PROFESOR ANTONIO MOLES CAUBET (translated).

11. Attached as **Exhibit 9** is a true and correct excerpt (with highlights) of Margot Y. Huen Rivas, *El Arbitraje Internacional en los Contratos Administrativos*, in 1 VIII JORNADAS INTERNACIONALES DE DERECHO ADMINISTRATIVO (Fundación Estudios de Derecho Administrativo ed., 2005).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 15th day of July, 2020

/s/ James R. Bliss

James R. Bliss